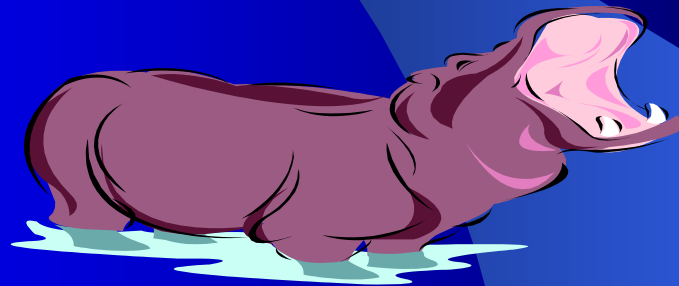


HIPAA Administrative Simplification Compliance Extension September 4 and 5, 2002

Edward Meyers
Interim Security Officer
Department of Mental Health



Disclaimer

The Missouri Department of Mental Health does not give legal advice, nor allege any legal expertise. Information and advice provided should be accepted as general in nature to guide the Missouri Department of Mental Health and its facilities' HIPAA Core Teams. Any and all other parties should consult professional counsel for specific legal advice.

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**Ann Dirks-Linhorst
Privacy Officer**

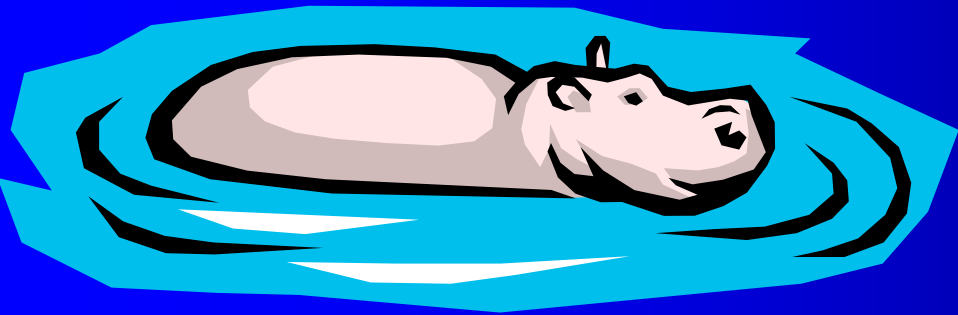
**Missouri Department of Mental Health
314.877.0123
(Fax) 314.644.8911**

What is HIPAA?

- The **H**ealth **I**nsurance **P**ortability and **A**ccountability **A**ct of 1996
 - Insurance Portability
 - Fraud Enforcement (Accountability)
 - Administrative Simplification
- Administrative Simplification
 - Transactions and Code Sets
 - Privacy
 - Security

Who is Covered by HIPAA?

- **Applies to covered entities (CE's):**
 - Health Care Plans
 - Health Care Clearing Houses
 - Health Care Providers who transmit (send) any health information in electronic form using any of the standard transactions



And Now the Standard Transactions

- Health Care Claims or Equivalent Encounter Data (837)
- Health Care Eligibility Benefit Inquiry and Response (270/271)
- Health Care Claim Status Request and Response (276/277)
- Health Care Service Review – Request for Review (278)

And Now Yet More of the Standard Transactions

- Benefit Enrollment and Maintenance (834)
- Health Care Claim Payment and Remittance Advise (835)
- Payroll Deducted and Other Group Premium Payment of Insurance Products (820)
- Coordination of Benefits
- NOTE: Direct data entry for any of the above transactions appears to make you a CE.

Scenes from Coming Transactions

- First Report of Injury
- Electronic Attachments



Administrative Simplification Compliance Act

- Also known ASCA and House Bill 3323
- Signed by President Bush on December 27, 2001
- Allows any CE to file for a transactions delay before October 16, 2002



ASCA - Continued



- Requires CE's to:
 - Draft and submit a compliance plan
 - Begin transaction testing no later than April 16, 2003
 - DMH
 - Medicaid
 - Medicare
 - Other third party payers
- Requires that all Medicare billing be done electronically by October 16, 2003

CMS Information

- Published sample Compliance Plan and instructions on March 29, 2002
- Urges CE's to file at CMS web site
<http://www.cms.gov/hipaa/hipaa2/ascaform.asp>
OR
- CE's may mail Compliance Plan to CMS if it includes all elements:
ATTENTION: Model Compliance Plan
Centers for Medicare and Medicaid
P.O. Box 8040
Baltimore, MD 21244-8040
- Extension is automatic

The Compliance Plan

- **Must include:**

- An analysis reflecting the extent to which, and the reasons why the CE is not compliant
- A budget, schedule, work plan and implementation strategy for achieving compliance.
- Whether the CE plan to use or might use a contractor or other vendor to assist the CE in achieving compliance

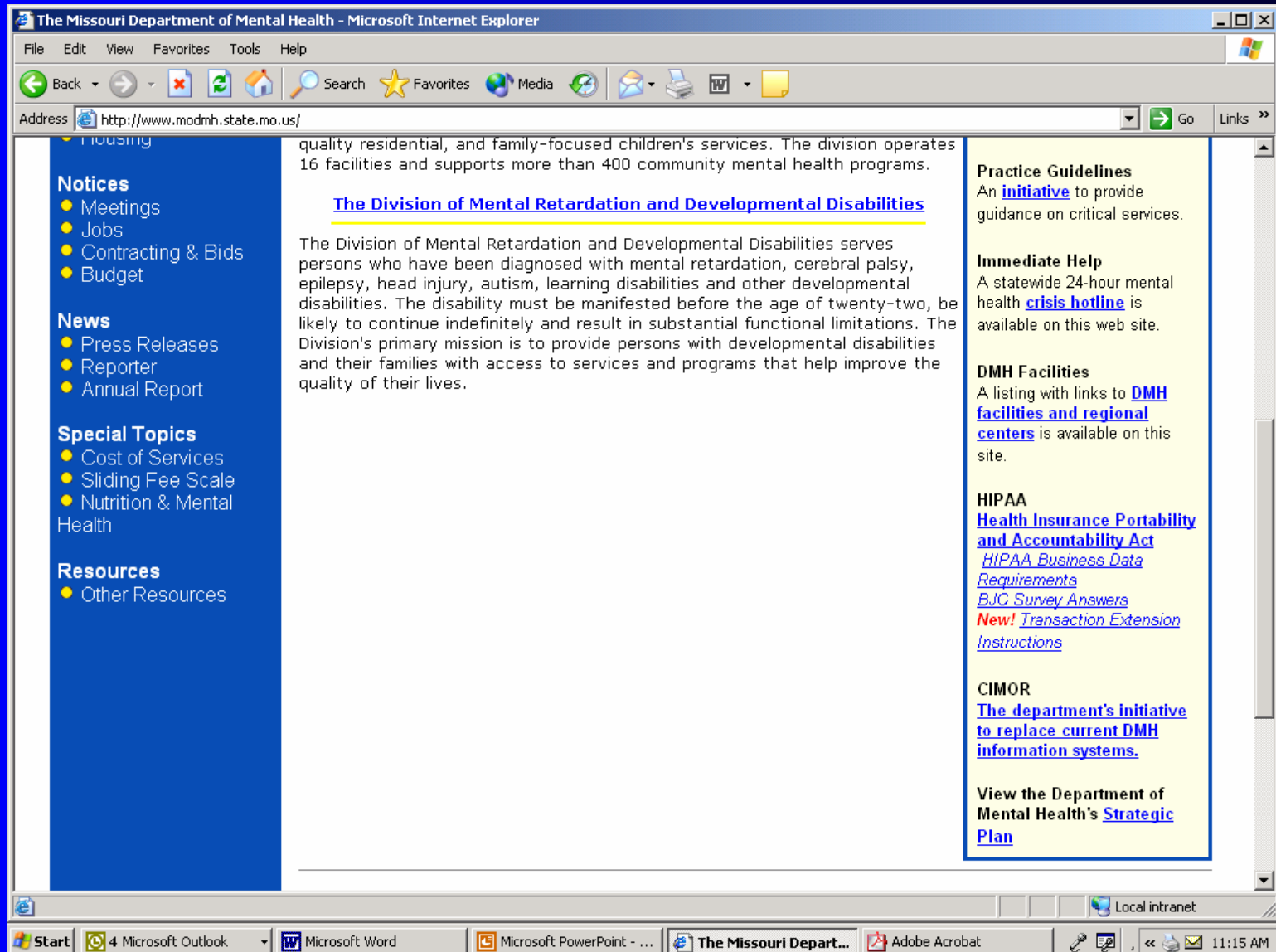
More of The Compliance Plan

- A timeframe for testing that begins no later than April 16, 2002
- Compliance must be achieved no later than October 16, 2003 for ALL CE's.
- Only 26 questions on CMS web site
 - Federal Tax ID Number
 - Responsible person
 - Medicare Number
- **The transaction delay does NOT change the Privacy implementation date of April 2003.**

What Has DMH Done?

- DMH submitted compliance plans for Central Office and all facilities on April 28, 2002.
- Established link to CMS form at our Internet site.
- CIMOR
 - Will handle transactions and code sets
 - You need to understand both the medical and non-medical code sets

DMH Web Site



What Should You Do?

- If you are waiting for CIMOR to do electronic billing – file for the extension.
- If you are a “batch provider” who is not HIPAA ready, file for the extension
- If you are a batch provider and are HIPAA ready, you do not need to file for an extension
 - **CAUTION**: Must be able to handle NDC codes.
 - J Codes are part of the NPRM for TCS changes
- Talk to your other payers

Where to Get More Information

- DMH Internet site
 - E-mail: HIPAA@mail.dmh.state.mo.us
- SNIP – www.mosnip.com
 - Regular monthly meeting in Columbia (not training)
- Implementation guides available from Washington Publishing Co
 - <http://www.wpc-edl.com>
- Department of Health and Human Services -
aspe.os.dhhs.gov/admsimp

Questions



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